

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:	) Chapter 7
	)
FORMER BL STORES, INC., <i>et al.</i> ,	) Case No. 24-11967 (JKS)
	)
Debtors. <sup>1</sup>	) (Jointly Administered)
	)
	) Obj. Deadline: 1/9/26 at 4:00 p.m. (ET)
	) Hrg. Date: 1/29/26 at 11:00 a.m. (ET)
	) Related to Docket Nos. 1247, 1441, 1841, 1871,
	) 2118, 2402, 2639, 2752, 2798, 2922, 3007, 3082,
	) 3101, 3177, 3260

---

**NOTICE OF THIRTEENTH MONTHLY, FOURTH INTERIM,  
AND FINAL FEE APPLICATION OF McDERMOTT WILL & SCHULTE LLP,  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR (I) THE MONTHLY PERIOD FROM OCTOBER 1, 2025 THROUGH  
NOVEMBER 10, 2025; (II) THE INTERIM PERIOD FROM JULY 1, 2025 THROUGH  
SEPTEMBER 30, 2025; (III) THE CASE PERIOD FROM SEPTEMBER 24, 2024  
THROUGH NOVEMBER 10, 2025; AND (IV) THE POST-CONVERSION  
PERIOD FROM NOVEMBER 11, 2025 THROUGH DECEMBER 15, 2025**

**PLEASE TAKE NOTICE** that on December 19, 2025, McDermott Will & Schulte LLP filed with the United States Bankruptcy Court for the District of Delaware the *Thirteenth Monthly, Fourth Interim, and Final Fee Application of McDermott Will & Schulte LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for (I) the Monthly Period from October 1, 2025 through November 10, 2025; (II) the Interim Period from July 1, 2025 through September 30, 2025; (III) Case Period from September 24, 2025 through November 10, 2025; and (IV) the Post-Conversion Period from November 11, 2025 through December 15, 2025* (the “Application”), which seeks approval of (i) monthly compensation for professional services rendered to the Committee in the amount of \$123,772.50, and expenses in the amount of \$0.00; (ii) compensation in the amount of \$590,929.00 for professional services rendered during the Interim Period, and expenses in the amount of \$0.00; (iii) compensation in the amount of \$6,330,982.00 for professional services during the Case Period

---

<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The former address of the Debtors’ corporate headquarters was 4900 E. Dublin-Granville Road, Columbus, OH 43081.

(as defined in the Application), and expenses in the amount of \$32,493.26<sup>2</sup>; and (iv) compensation in the amount of \$37,812.00 for professional services rendered during the Post-Conversion Period, and expenses in the amount of \$0.00.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on January 9, 2026 (the “Objection Deadline”)**: (i) the Debtors, c/o Big Lots, Inc., 4900 E, Dublin-Granville Road, Columbus, OH 43081, Attn: Ronald A. Robins (rrobbins@biglots.com); (ii) counsel to the Debtors, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, NY 10017, Attn: Brian M. Resnick, Adam L. Shpeen, Stephen D. Piraino, and Ethan Stern (notice.biglots@davispolk.com); (iii) Delaware counsel to the Debtors, Morris, Nichols, Arsh & Tunnell LLP, 1201 N. Market Street, 16th Floor, Wilmington, DE 19801, Attn: Robert J. Dehney, Sr., Andrew R. Remming, Daniel B. Butz, Tamara K. Mann, and Casey B. Sawyer (biglots.mnat@morrisnichols.com); (iv) counsel to the ABL Agent, Choate Hall, & Stewart, LLP, 2 International Place, Boston, MA 02110, Attn: John Ventola (jventola@choate.com), Jonathan Marshall (jmarshall@choate.com), and Jacob Lang (jslang@choate.com); (v) counsel to the Term Agent, Otterbourg P.C., 230 Park Avenue, New York, NY 10169, Attn: Chad B. Simon (csimon@otterbourg.com), James V. Drew (jdrew@otterbourg.com), and Sarah L. Hautzinger (shautzinger@otterbourg.com); (vi) counsel to the Committee, McDermott Will & Schulte LLP, One Vanderbilt Avenue, New York, NY 10017, Attn: Darren Azman (dazman@mwe.com) and Kristin Going (kgoing@mwe.com); (vii) Delaware counsel to the Committee, Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, DE 19801, Attn: Justin R. Alberto (jalberto@coleschotz.com) and Stacy L. Newman (snewman@coleschotz.com); and (viii) the U.S. Trustee, Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Linda Casey (linda.casey@usdoj.gov).

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Application will be held on **January 29, 2026 at 11:00 a.m. (ET)** before the Honorable J. Kate Stickles, United States Bankruptcy Judge of the United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom No. 6, 824 North Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

[*Remainder of Page Intentionally Left Blank*]

---

<sup>2</sup> This amount reflects (i) a voluntary reduction of expenses in the amount of \$2,007.25, as referenced in the *First Omnibus Order Granting Interim Allowance of Fees and Expenses for Certain Professionals* [Docket No. 2271] (the “First Interim Fee Order”); and (ii) a voluntary reduction of expenses in the amount of \$76.21, as referenced in the *Second Omnibus Order Granting Interim Allowance of Fees and Expenses for Certain Professionals* [Docket No. 2973] (the “Second Interim Fee Order”).

Dated: December 19, 2025  
Wilmington, Delaware

**COLE SCHOTZ P.C.**

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)  
Stacy L. Newman (No. 5044)  
500 Delaware Avenue, Suite 600  
Wilmington, DE 19801  
Tel: (302) 652-3131  
Fax: (302) 652-3117  
Email: jalberto@coleschotz.com  
snewman@coleschotz.com

-and-

Sarah A. Carnes, Esq. (admitted *pro hac vice*)  
1325 Avenue of the Americas, 19<sup>th</sup> Floor  
New York, NY 10019  
Tel: (212) 752-8000  
Fax: (212) 752-8393  
Email: scarnes@coleschotz.com

-and-

**MCDERMOTT WILL & SCHULTE LLP**

Darren Azman (admitted *pro hac vice*)  
Kristin K. Going (admitted *pro hac vice*)  
Stacy Lutkus (admitted *pro hac vice*)  
Natalie Rowles (admitted *pro hac vice*)  
One Vanderbilt Avenue  
New York, NY 10017  
Tel: (212) 547-5400  
Fax: (212) 547-5444  
Email: dazman@mwe.com  
kgoing@mwe.com  
salutkus@mwe.com  
nrowles@mwe.com

*Counsel to the Official Committee of Unsecured Creditors*